#### **Bureau of Nutrition and Health Services**

#### **State Review Summary Report**

#### Ottumwa Comm School District (50490000)

November 8-10, 2016

Program Year: 2017
Month of Review: October

Lead Reviewer:Cheryl BensonOrg Representative(s):Yvonne Johnson

#### **Org - Level Findings**

Area Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - V-0100 Certification and Benefit Issuance	The following benefit issuance errors were documented.  (1) Seven applications were determined incorrectly because the number of household members was fewer than the number used for determination. The error caused four households to receive higher benefits. Two of those households moved from reduced to denied, and two households moved from free to reduced. The remaining three households stayed at the same benefit level. (2) Income on two applications was incorrectly determined, one household as free instead of denied benefits, and one household as free instead of reduced benefits. (3) Three applications were missing the required last four digits of an adult's social security number or an indication that the household does not have a SSN. (4) Only members of a household that are self-employed may use annual income for application determination. Those not self-employed must indicate the frequency and amount of income. One household	For your response: (1) and (2) Send letters of adverse action to the six households, giving the households ten days to appeal and information on how to appeal before changing the household's status. Once the ten days is over, the household must be moved to the lower benefit level if no appeal is received. Submit copies of the letters of adverse action. The household names and specific errors are listed on the SFA-1 on IowaCNP. (3) The missing SSNs were obtained during the on-site review. No further action is required. (4) Contact the household to determine whether the household member is self-employed, indicate the business in your response. If the household member is not self-employed, have the household complete a new application, or correct the current one and submit a copy of the application. (5) Submit a copy of the waiver that Ottumwa will begin to use that includes specific fees and a statement that the waiver does not impede benefits. A prototype waiver was provided and further	

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		indicated an annual income without	information about waivers was provided	
		indicating they are self-employed. (5)	during the on-site review.	
		In order to use free and reduced		
		information from the benefit issuance		
		process for school fees, the household		
		must sign a waiver giving the		
		organization permission to use the		
		application for that purpose. The		
		waiver must indicate each specific fee		
		that will be waived and the dollar		
		amount of each fee. Ottumwa had a		
		waiver, but it did not state specific fees		
		or the dollar amount. The waiver also		
		must indicate that failure to sign the		
		waiver does not impede the household		
		from receiving free or reduced		
		meals. Even if waivers are provided, if		
		the waiver is not signed and dated, the		
		fees cannot be waived.)		
200 - Verification	V-0200	The most recent Verification from SY 2015-2016 was not correctly completed. For Standard	For your response, submit all applications, income documentation submitted by households, and	
		Verification, 3% of eligible applications are to be verified. (1) The organization verified one too	determination/results of the verification process for this year's (SY 2016-17) Verification so that the	
		many applications. (2) Only one of the	documentation and results can be checked. Also have	
		applications was selected from error prone applications even though there were sufficient	the Verifying Official complete the Verifying Eligibility module on Iowa Learning Online Professional	
		error prone applications to select from. (3) Three	Development and submit a copy of the completion	
		applications that were verified were denied	certificate.	
		applications which are not subject to		
		verification. One of those three should not have been denied, but should have been receiving		
		reduced benefits. The Confirming Official should		
		have caught this error when checking the original		
		determination. (4) One household was verified as		
		free but should have been denied. Income was calculated as every two weeks instead of weekly		
		and regular additional pay was not included. (5)		
		One household was verified as free but should		
		have been reduced. Income was doubled and		
		entered as monthly instead of bi-weekly. (6) One household was verified as free should have been		
		denied. Income was entered as twice a month		
		instead of be-weekly and a second income was		
		not verified. (7) One household verified as free		
		should have been denied due to additional		

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		income that was not included.		
	V-0700	Beginning July 1, 2016, SFAs (School Food Authorities) are required to have a written procurement plan and a written code of conduct that covers solicitation. (1) The SFA does not have a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan does not indicate those responsible for rewarding, reviewing, documenting and monitoring procurement events. (2) The code of Conduct is not comprehensive for Child Nutrition, CN, programs. The current conflict of interest policies are mainly related to selling books and school supplies or working other jobs outside of school employment instead of governing the actions of employees who are involved in the procurement process. The code does not address accepting gratuities, favors, or other monetary items. There is no disciplinary action spelled out for violations of the code, and there are no checks and balances in the policy to ensure that no one single person has total control over any one aspect of finances.	For your response, (1) complete a written procurement plan. The state template is available at www.educateiowa.gov, or you may use your own template as long as it includes the required information. (2) Indicate a timeline for either adding required items to the current school's code of conduct, or creating a separate code of conduct for CN programs.	
800 - Civil Rights	V-0800	Before special diets can be provided to students, documentation of the need for the diet must be on file. In the case of a documented disability, the organization must accommodate the disability and the organization is allowed to deviate from the meal pattern and still claim the meal. For a medical condition that falls short of a disability, the organization is encouraged to accommodate the condition, but the organization is not allowed to deviate from the meal pattern and still claim the meal.  . (Example: A student may be allowed to substitute orange juice for milk and still credit the juice as a milk component for a disability but not for a	For your response, submit special diet forms for all of the students on the list from Wilson Elementary and also indicate who will be responsible for obtaining forms for students at all school buildings who are on special diets. (See attachment) Also indicate who will be responsible for following up annually to see if the information is correct.	

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medical condition that is not a
disability.) Ottumwa indicated that
there were no special diets in the
district. However, a list of students
with food allergies was posted on the
refrigerator at Wilson Elementary.
Before a disability or medical condition
can be accommodated, a special diet
form must be on file. None of the
special diets being provided at
Ottumwa are correctly documented on
special diet forms. The required form
is attached below. The form does not
have to be completed annually if the
information is correct. The SFA should
contact the household annually to
determine whether the information on
the form is still current.

# Site - Level Findings: Eisenhower ElementarySchool (0423)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	Ottumwa permits overt identification of students. This was especially obvious at Eisenhower due to larger computer screens. The screen indicates "Eligibility" and then has #1, 2, or 3 depending on whether the student is free,	For your response, (1) indicate how and when this error was corrected and whether it was corrected at all buildings in the district. (2) Indicate how access to individual students' eligibility information will be made accessible to only those who have a need to know and when this is/was implemented. Refer to pages 68-78 in the Eligibility Manual.	
1400 - Food Safety	V-1400	required to post the latest Health Inspection	For your response, (1) indicate that the latest Health Inspection Report is now posted in a publicly visible location at all sites. (2) Indicate the date that	

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Health Inspection Report was not posted in a	temperature logs were provided to the two elementary	
publicly visible location at any of the three sites	sites and who will periodically check to ensure that	
reviewed. (2) The temperature of all coolers,	logs are maintained.	
freezers, high-temp dishwashers, and storage		
areas used for Child Nutrition programs must be		
checked. Temperatures for coolers, freezers,		
and dishwashers must be recorded daily.		
Temperatures for refrigerators and milk coolers at	t	
Wilson and Eisenhower are not recorded.		

# Site - Level Findings: Wilson ElementarySchool (0517)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	A Point of Service (POS) is required at the location and time where the student is served. There must be some exchange with the student for the meal—name, ticket, PIN#, card,etc. Kindergarten students at all elementary sites do not have a POS. The count is either taken in the classroom or the student is visually recognized or the teacher reports attendance. Using these methods typically results in inaccurate meal counts. At Wilson, the cashier also indicated that she would check names after the meal service and add students who she believed she missed. This practice is not allowed. (The POS should be checked at each site during the annual monitoring that must be completed to ensure the POS is compliant with requirements.)	For your response, indicate how the POS has been changed for kindergarten to bring it into compliance with requirements and indicate when the change was implemented. If different methods have been implemented at different sites, indicate all methods being used and indicate which sites use which method.	
500 - Offer versus Serve	V-0500	The site application for Wilson Elementary indicates the Offer vs Serve, OVS, is used. However, upon observation of meal service, OVS is not utilized; Wilson is using Serve Only. Serve Only may be a better option for Wilson, but the application must accurately indicate which method is being used.	For your response, either submit documentation that staff at Wilson Elementary have received OVS training, or indicate that the site application has been changed to Serve Only.	
1300 - Water	V-1300	Regulations require that free, potable water be available in the place where meals are served or immediately adjacent (within eyesight) from the place where meals are served. Free potable water is not available to students for lunch or breakfast at either Wilson Elementary or Evans Middle School.	For your response, indicate how water will be made available to students at Wilson Elementary and Evans Middle School, and also at any other building where water is not currently available. (There are a variety of ways to implement this requirement including pitchers and cups, water fountain, faucet that allows students to fill their own bottles or cups, insulated beverage carboys, etc.)	

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#### Site - Level Findings: Evans Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Lunch	V-0400	(1) When using Offer vs Serve, OVS, students must have at least a half-cup of fruit or a half cup of vegetable, or a combination of fruit and vegetable on their trays plus two additional components at lunch and two additional items at breakfast. Seven lunches and five breakfasts did not include the required half-cup of fruit or vegetable. These meals are not reimbursable and were added to the potential overclaim. The lunches were overlooked probably due to the speed of the line. The breakfasts were overlooked due to a misunderstanding of requirements. (2) Some menu items offered at Evans MS do not meet the weekly grain minimum of 8 ounce equivalents per week. The croissant used for sandwiches is 1.5 ounce equivalents which equals 7.5 ounces per week. The taco on the hot lunch line was 1 ounce equivalent which would have made the week's total 7 ounces. (3) There is a lunch meat sandwich offered daily with three different types of bread. Two ounces of lunch meat is used per sandwich, but the ounce equivalent of the meat only credits for half of the serving size and the processed swiss cheese only credits for 1/4 ounce of meat/meat alternate making the sandwich only 1.25 ounce equivalents. Students must be offered at least 9 ounce equivalents of meat/meat alternate per week, but the sandwiches only provide 6.5 to 7.5 ounces per week. (4) Regulations currently require that all grain items offered for both breakfast and lunch be at least 50% whole grain. Organizations can request waivers for some grain items, and Ottumwa currently has waivers for pasta and tortillas. There were three non-whole grain items being used that are not waiveredcorn dogs, mini-bagels, and croissants. (5) It was not clear from invoices whether the hamburger buns used are 1.5 oz equivalents of grain or 2 oz equivalents of grain. If they are 1.5 ounces, then they would be short of the weekly minimum requirement.	For your response, (1) indicate how the lunch line will be altered to ensure that cashiers have time to observe trays for reimbursable meals. For breakfast, submit documentation that cashiers at all buildings have received training on what constitutes a reimbursable breakfast. (2) and (3) Indicate how you will ensure that weekly minimums are met for meat and grain. Submit standardized recipes for the three sandwiches as well as labels for the meat and grain items replacing current meat and grain items. (4) Submit labels for the corn dogs, bagels and croissants that indicate these items are at least 50% whole grain. (5) Either submit invoices and labels to document that the larger bun was being purchased in October and November, or submit an invoice and label that documents the larger buns are currently being purchased.	
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records, FPRs, serve many purposesinventory control, history of what works and what doesn't, participation, and they can help with	For your response, (1) submit one week of lunch FPRs from Evans MS that are correctly completed. Also submit copies of certificates that show Evan's kitchen manager has completed the following modules from lowa Learning On-line Professional Development: Food Buying Guide, Food Labels, Food Production	

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		forecasting. FPRs are also required by regulation and must correctly reflect what is offered for reimbursable meals. They should be started before meal preparation and completed after meal service. (1) FPRs from Evans are being completed after the meal is served and are filled in with incorrect information. The records indicate that the same number of servings of every food item is prepared which is not reasonable when OVS is used, and is not what was observed during meal service. Also there is exactly the same number of servings of each food item left over. Finally, adults and a la carte are not recorded as required. (2) FPRs for Afterschool Snack at Wilson Elementary were sometimes correct and other times not correct. For example, one FPR had the serving size for carrots as "1," while another FPR had the serving size for carrots as "2 bags." The FPR must document that a reimbursable snack was provided and must have serving sizes clearly indicated in measurable amounts.	Records, and Standardized Recipes. (2) This error was discussed. No further action is required.	
800 - Civil Rights	V-0800	Students who are serving in-school suspension are not provided with the same choices as other students. An adult goes to the cafeteria and picks up a sack lunch (ham sandwich, 1 cup carrots, fruit, milk) for the student. The student is not offered the other choices available to all other students such as hot lunch, three sandwich choices, fruit salad, or chef salad, and the count of the meal is not taken at the POS. This also does not meet the district's Wellness Policy which states that food will not be used as punishment.	For your response, either indicate that the meals will not be claimed, or describe how this practice will be changed so that students serving in-school suspension are not discriminated against. Some suggestions were provided such as allowing these students to come to the cafeteria at a separate time to select a meal from all choices, or provide a menu to the students and allow them to select the meal they want from the choices.	

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#### **Org - Level Technical Assistance**

Area	Question	Comments
		A copy of "No Time to Train," a year's worth of ten-minute workshops was provided during the on-site review.
		Additional information and resources for breakfast and summer outreach was provided at the beginning of the on-site review.
		All sites reviewed had the required And Justice for All poster, but the poster must be at least 11x17 inches. New posters were ordered for the SFA.
		Technical assistance was provided on negative balance policies. No later than July 1, 2017, all SFAs must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to this issue. Policies must be provided to the state agency during the next Administrative Review. Guidance was provided to the director.
100 - Certification and Benefit Issuance	102 a. Does the SFA use an electronic applications approval system or a manual application approval system? Starting in 2015-16, if a combination of electronic and manual is used, select "Combination".	Technical assistance was provided on implementing an Online Application System. The Ottumwa district is starting electronic registration next year (2017-18) and hopes to implement an online application system the year after that. In order to use an online application system, the system must be approved by the State Office. There is a form in Download Forms titled "Application Request Form-Online" that must be completed and submitted to Deb Linderblood.
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1.	Technical assistance was provided on methods to better document other household members in a house with a student who is directly certified, DC. The current method is unorganized and difficult to read. The SFA could add a column to the DC list and indicate other household members in that column so that it attaches to the student on the DC list. Or, there could be a separate "Other Household Members" list that is tracked by household number. The district can also combine all DC, potential, migrant, homeless, and Elookup students on one spreadsheet per DC period or per month.
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	Technical Assistance was provided on Wellness Policy, and additional requirements for the policy from The Healthy Hunger Free Kids Act of December 2010. More information is available at http://www.fns.usda.gov/school-meals/local-school-wellness-policy. There are new requirements to report out to the community on the results of the assessment, the extent that the district is in compliance with their policy, and a description of progress made in attaining the goals of the policy. The new USDA wellness policy requirements also include

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		assurance that potential stakeholders are made aware of their ability to participate in the development, review,update, and implementation of the Local School Wellness Policy. The district is currently in the process of updating the policy. A form was provided that can be used to assess individual goals at each building. Those forms can then be shared with the community via the district's website. This assessment must be conducted at least every three years. A folder with several resources was left with the director and an email was recently sent to SFAs with a link to a new toolkit.
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	Technical assistance was provided on Smart Snack requirements. All food sold to students from midnight the night before until a half hour after the end of the school day must meet Smart Snack regulations. Documentation of compliance with the regulations must be available for review. Food sold to students includes the cafeteria, vending machines, school stores, school cafes, fundraisers, etc. Beverages in a vending machine at the high school were not in compliance with regulations. Information on acceptable beverages was provided, and the vending supplier was contacted. The unallowable beverages were removed, and a plan to prevent future errors was implemented.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	Technical assistance was provided on food safety. (1) The HACCP plan must include comprehensive Standard Operating Procedures, SOPs, for all sites that prepare and/or serve meals. Check each sites plan for missing SOPs and for needed updates of SOPs. Regularly check the ISU website for new and revised SOPs and add as needed. Not all buildings need all the same SOPs; preparation kitchens will have a much more comprehensive book of procedures than a serving site that does no food preparation. (2) When offering Breakfast in the Classroom, each classroom should have SOPs that address proper food safety measures. Also when recording temperatures of cooling equipment, be sure to indicate any action taken should the temperature be at or above the safety line. (3) Students at Wilson Elementary were observed returning milk to the cooler and selecting a different milk. This practice should not be allowed since it could easily spread Norovirus and other diseases. (4) If sharing tables are used, or there is a place for students to place uneaten food, temperature controlled items such as milk should not be put back into coolers for resale. Packaged, non-temperature controlled foods may be sanitized and placed back into storage.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Technical assistance was provided on Verification.  Be sure to verify all sources of income indicated on applications. When confirming the applications, take a serious look at the income, number in the household, etc. This is where any errors in the original determination should be caught. When verifying, pay special attention to the frequency

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	of income and cross-check with the submitted pay stubs. Households should submit at least one month of documentation; if not, request further documentation from the household. Spot-check results from your POS system to determine whether the applications selected are error prone, that the correct number is selected, and be sure the original determination correct.

# Site - Level Technical Assistance Evans Middle School (0209)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	To avoid lunch meals being counted as reimbursable when a component is missing, either the line could be slowed down by removing the double keypads at the two stations or by using regular trays instead of Styrofoam or by having students set the foam trays down so that the entire meal can be viewed. All of the meals that were miscounted were wrap sandwiches. Once the wrap sandwich and a bag of chips are on the foam tray, it is difficult to view any other items on the tray.
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Technical assistance was provided to clarify the requirements for OVS at breakfast. Students must select at least three items and one of those three items must be a 1/2 cup of fruit/juice/vegetable.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Technical assistance was provided on required signage at meals. Signage explaining what constitutes a reimbursable meal is required for both breakfast and lunch at the beginning of each separate food line. For lunch, the signs must indicate that a reimbursable meal includes a minimum of three components, one of which must be1/2 cup of fruit or vegetable. The signage must also indicate which food items fulfill which component. For breakfast, the signs must indicate how many items each food item fulfills. Signage is available from Team Nutrition in Des Moines or on the DE website at www.educateiowa.gov
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	Technical assistance was provided on correctly completing Food Production Records.
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Technical assistance was provided on trans-fats. Trans-fats are not permitted in Child Nutrition Programs. The block margarine currently in storage contains trans-fats. The current inventory can be used up, and then non-trans-fat margarine must be purchased. Future solicitations should indicate that trans-fats are not allowed. The following is an

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	example of a statement that can be used in solicitations.
	Food products and ingredients used to prepare schools meals must contain zero grams of trans fat (less than 0.5 grams) per serving. Documentation for food products and food ingredients must indicate zero grams of trans fat per serving. Meats that contain a minimal amount of naturally-occurring trans fat are allowed. All food products offered on this bid must be documented with a nutrition label or manufacturer specification listing the trans fat contribution.

#### Site - Level Technical Assistance Eisenhower ElementarySchool (0423)

Area	Question	Comments
		Technical assistance was provided on supervision of reimbursable meals at Eisenhower Elementary. Since the site has an alternate POS (at the beginning of the line), the site must have a plan to ensure reimbursable meals. According to the site application, the last person on the serving line is responsible. However, at Eisenhower, there is only one staff member on the serving line along with four student volunteers. The staff member is currently located at the beginning of the serving line where it is very difficult for her to ensure reimbursable meals. It is highly recommended that the staff member be placed at the end, or close to the end, of the serving line.

#### **Org - Level Commendations**

#### **Description**

APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were very well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were, signed and dated by the household member and the SFA, and were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Free meals are extended to all members in the household. The SFA has a back-up system for benefit issuance documents and system.

CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria at all three sites observed. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. Ethnic/racial information is collected and the form is completed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.

FFVP - The Food Service Director works closely with the distribution company to identify produce items seasonally available which are more cost effective. Also coordinates the prepackaging of produce that may not typically be available. Offers a balance of whole produce items with precut/prepackaged items. Is looking to introduce some more exotic type of produce into the FFVP.

HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan. A copy of the written plan was available at the sites reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. There were no critical areas noted on any of the latest health inspection reports. Temperature logs are maintained for most coolers-including milk coolers, freezers, food served,

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and dishwasher at Evans. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of October were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. POS were organized and orderly. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Cashiers are trained annually

MEAL REQUIREMENTS & COMPONENTS: The numerous choices available at Evans increases participation and provides opportunities for each child to find meal components for lunch that they will eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Documentation indicated that foods purchased and food production ensured meals contained the required components. Documentation for component crediting was on file for most items. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. Standardized recipes were available for some items. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Good signage was posted at Evans explaining what constitutes a reimbursable lunch. A monthly menu is posted at all sites. Food service staff were polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period. Nutrient analysis was not required. Student volunteers help serve and clean tables at the elementary buildings.

PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, and all other staff have received at least 6 hours for FT and 4 hours for PT of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: The Resource Management section of the Off-Site Assessment tool was completed on time. Financial records that were reviewed, indicated appropriate and allowable expenditures. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The Non-Program Revenue, NPR, tool was completed, and no increase in prices were required. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities.

School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program. Reminders of the SBP were also sent out throughout the school year.

VERIFICATION: The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training.

WELLNESS POLICY: The district has a wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public on the district's website. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

#### Site - Level Commendations Wilson ElementarySchool (0517)

#### Description

Afterschool Snack: The snack was served after the end of the school day. The count was correctly taken at the time and point of service and counts were reasonable when compared with the past five days. The first 4-week monitoring of the program was completed. Food production records were on file. The And Justice for All poster was in the meal service area, and there were activities associated with the snack service.

FFVP - Good outreach efforts noted with 2 press releases and media coverage of the Apple Crunch Day.

FFVP - The Fresh Fruit and Vegetable Program is widely supported in the building from the food service staff to the teachers to the Principal